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April 23, 2024

**VIA ELECTRONIC MAIL AND ECF FILING**

Honorable Paul A. Engelmayer  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *Jane Street Group LLC v. Millennium Management LLC*, 24 C 2783 (PAE)

Dear Judge Engelmayer:

Pursuant to the Court's April 19, 2024 Oral Order and Your Honor's Individual Rule 4(B) (Redactions and Filing Under Seal), Defendant Millennium Management LLC ("Millennium") respectfully submits this letter and accompanying redacted filings.

Millennium's proposed redactions are narrowly tailored, consistent with the presumption in favor of public access to judicial documents. *See Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 119-20 (2d Cir. 2006). Millennium proposes that its letter-brief opposing Jane Street's application for a temporary restraining order (ECF No. 26) be public in its entirety. Millennium proposes to redact, in the Declaration of Michael Asmar (ECF No. 27), only (1) the name of a third party and (2) certain non-public information regarding the compensation structure for one of the individually named defendants. These are marked in green highlighting in the sealed documents accompanying this letter.

Jane Street, however, has proposed unreasonable, overbroad redactions to both Millennium's letter-brief and the Asmar Declaration, as well as Jane Street's own filings. Jane Street's proposed redactions to Millennium's documents are marked in yellow highlighting in the sealed documents accompanying this letter. By way of example, Jane Street is attempting to redact reference to a publicly available article that was referenced in open court. Given the early stage of this case, and given that no protective order has issued, Millennium has applied Jane Street's requested redactions in the public versions of its materials. But Millennium strongly believes that much of what Jane Street has proposed redacting from its own filings is in fact not confidential to Jane Street. Indeed, Jane Street has yet to identify what is the trade secret they purport to protect and has just today announced that it is withdrawing its claims for preliminary and permanent injunctive relief. Accordingly, Millennium reserves all rights to challenge that any of the material sought to be redacted by Jane Street amounts to a "trade secret."



Respectfully submitted,

*/s/ Andrew J. Levander*

Andrew J. Levander

Enclosures